

Draft Low Resolution Coring Characterization Summary Report dated July 2011
Lower Passaic River Study Area RI/FS
Response to EPA Comments

No.	Item/Section	Comment	Response
1	General Comment	<p>While we are generally pleased with the revised figures in this report, there are still a number of changes EPA would suggest to how the sediment data is ultimately presented. However, at this point, these modifications can be discussed during the RI/FS technical meetings we are having and made in the draft RI report. The LRC report can stand as is, except for the remaining comments described below.</p> <p>There are also two issues that we do not think were adequately addressed in the revised LRC report that, again, can be further discussed in the draft RI report rather than modified in this report:</p> <ul style="list-style-type: none"> a. Outlier/extreme value analysis – we need to further discuss how this will be conducted and how it will be used. b. Data gap analysis – two additional rounds of sediment sampling were completed since the time of this report. The results need to be evaluated together, and a formal data gap analysis must be included in the RI report. If significant data gaps are discovered, then the decision can be made whether these should be addressed during the RI/FS process, or if they can wait to be filled during a pre-design investigation. 	<p>No response is required at this time. These comments will be addressed as part of the Remedial Investigation (RI) report.</p>

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2	Executive Summary	To avoid any confusion, please add a sentence or two to the executive summary stating that this report was largely completed in July 2011, and it reflects work conducted as part of the original low resolution coring program effort that was completed in 2008. This current version (dated 2014) includes only minor updates to the previous version, but does not include any information about subsequent sediment sampling programs.	The Executive Summary has been edited to address the comment.
3	Figure 1-3	The legend indicates that the high-resolution cores should be marked on the figure, but they are not. Please revise to include the locations of the high-resolution cores.	Figure 1-3 has been updated to identify the high-resolution (finer segmentation) cores.
4	Page 3-3, Section 3.1.9	This section references the Risk Assessment Data Usability and Data Evaluation Plan, which has not yet been finalized. The report should be referenced appropriately.	A reference has been added to Section 3.1.9 to reflect that this plan is in preparation, and the full reference to the plan has been included in Section 5.0, References.
5	Table 3-3, Page 3-10	The highest concentration (Rank 1) concentration listed for 2,3,7,8-TCDD should be 13,500 ppt, not 3,500.	This comment is correct and Table 3-3 has been updated as requested in the comment.
6	Section 4.2.3, Data Usability, PCDDs/PCDFs	The disparity that was observed between the CPG sample results and the split sample results should be mentioned here. Although this topic is discussed in Section 2.11.4.3, some mention of the issue should be included in this section as well. As it is currently written, the reader is lead to believe that there are no issues with the dioxin/furan data set.	Section 4.2.3 has been modified to indicate that results were adjusted based on split sample results and to refer the reader to Section 2.11.4.3.

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7	Figures 3-3a to n	The rest of the comments relate specifically to Figures 3-3a to n. CDM reviewed these figures and found the following discrepancies between them, the data in their database, and that included in Appendix O of the LRC report. In the majority of cases, the database and Appendix O agreed, which implies the figures should be adjusted accordingly.	The values presented on the figures that appear to be discrepancies are the average of the sample and duplicate results. In a letter dated January 25, 2011, EPA requested that field duplicates for the LRC be included in the data evaluation. Therefore, as specified in the introductory text in Section 3.0 of the LRC report, <i>“For these data presentations, samples that had associated field duplicates are represented by an average of the detected results; if one result was not detected, the value of the detected result is used, and if both were not detected, the sample is shown as “ND” at the average of the detection limits (DLs).”</i> No edits to the report or figures are required to address this comment. See specific responses below.
	Figure 3-3.a 2,3,7,8-TCDD 0– 0.5 feet	1. Location 006; the result for sample 08A-006-C1AS is 162 ng/kg in Appendix O. The figure has a value of 255 ng/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0006-C1AS) in Appendix O is 162 JF ng/kg and the result for the duplicate (08A-0006-C1AT) is 347 JF ng/kg. The average of these results is 254.5 ng/kg (rounded to 255 ng/kg).
		2. Location 066; the result for sample 08A-066-C1AS is 48.7 ng/kg in Appendix O. The figure has a value of 31.3 ng/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 48.7 JF ng/kg and the result for the duplicate (08A-0066-C1AT) is 13.9 JF ng/kg. The average of these results is 31.3 ng/kg.
		3. Location 040; the result for sample 08A-040-C1AS is 1,364 ng/kg in Appendix O. The figure has a value of 1,260 ng/kg reported.	Note that this comment is incorrect. The correct value is presented in the figure. The value in the figure is 1,360 ng/kg. The value in Appendix O for sample 08A-0040-C1AS is 1,360 F ng/kg.
	Figure 3-3.b Total TEQ 0– 0.5 feet	1. Location 066; the result for sample 08A-066-C1AS is 53.6 ng/kg in Appendix O. The figure has a value of 37.2 ng/kg reported.	The correct value is presented in the figure which is average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 53.6 F ng/kg and the result for the duplicate (08A-0066-C1AT) is 20.8 F ng/kg. The average of these results is 37.2 ng/kg.

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7	Figure 3-3.c Total PCB 0.0 – 0.5 feet	1. Location 017; the result for sample 08A-017-C1AS is 1.16 mg/kg in Appendix O. The figure has a value of 1.21 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0017-C1AS) in Appendix O is 1,160,000 ng/kg and the result for the duplicate (08A-0017-C1AT) is 1,260,000 ng/kg. The average of these results is 1,210,000 ng/kg (or 1.21 mg/kg).
	Figure 3-3.c Total PCB 0.0 – 0.5 feet (continued)	2. Location 029; the result for sample 08A-029-C1AS is 8.78 mg/kg in Appendix O. The figure has a value of 7.01 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0029-C1AS) in Appendix O is 8,780,000 ng/kg and the result for the duplicate (08A-0029-C1AT) is 5,250,000 ng/kg. The average of these results is 7,015,000 ng/kg (reported on the figures as 7.01 mg/kg).
		3. Location 066; the result for sample 08A-066-C1AS is 0.111 mg/kg in Appendix O. The figure has a value of 0.114 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 111,000 ng/kg and the result for the duplicate (08A-0066-C1AT) is 117,000 ng/kg. The average of these results is 114,000 ng/kg (or 0.114 mg/kg).
	Figure 3-3.d High Molecular Weight PAHs 0 – 0.5 feet	1. Location 017; the result for sample 08A-017-C1AS is 12.8 mg/kg in Appendix O. The figure has a value of 14.2 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0017-C1AS) in Appendix O is 12,800 ng/g and the result for the duplicate (08A-0017-C1AT) is 15,600 ng/g. The average of these results is 14,200 ng/g (or 14.2 mg/kg).
		2. Location 029; the result for sample 08A-029-C1AS is 43.6 mg/kg in Appendix O. The figure has a value of 41.5 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0029-C1AS) in Appendix O is 43,600 ng/g and the result for the duplicate (08A-0029-C1AT) is 39,400 ng/g. The average of these results is 41,500 ng/g (or 41.5 mg/kg).
		3. Location 066; the result for sample 08A-066-C1AS is 7.62 mg/kg in Appendix O. The figure has a value of 9.16 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 7,620 ng/g and the result for the duplicate (08A-0066-C1AT) is 10,700 ng/g. The average of these results is 9,160 ng/g (or 9.16 mg/kg).
	Figure 3-3.e Low Molecular Weight (LMW) PAHs 0 – 0.5 feet	1. Location 017; the result for sample 08A-017-C1AS is 1.96 mg/kg in Appendix O. The figure has a value of 2.15 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0017-C1AS) in Appendix O is 1,960 ng/g and the result for the duplicate (08A-0017-C1AT) is 2,340 ng/g. The average of these results is 2,150 ng/g (or 2.15 mg/kg).

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7		2. Location 029; the result for sample 08A-017-C1AS is 9.69 mg/kg in Appendix O. The figure has a value of 9.24 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0029-C1AS) in Appendix O is 9,690 ng/g and the result for the duplicate (08A-0029-C1AT) is 8,790 ng/g. The average of these results is 9,240 ng/g (or 9.24 mg/kg).
	Figure 3-3.e Low Molecular Weight (LMW) PAHs 0 – 0.5 feet (continued)	3. Location 066; the result for sample 08A-017-C1AS is 1.38 mg/kg in Appendix O. The figure has a value of 2.87 mg/kg reported.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 1,380 ng/g and the result for the duplicate (08A-0066-C1AT) is 4,360 ng/g. The average of these results is 2,870 ng/g (or 2.87 mg/kg).
	Figure 3-3.f Total DDX 0 – 0.5 feet	1. Location 017; the result for sample 08A-017-C1AS is 0.102 mg/kg in Appendix O. The CPG's figure has a value of 0.0612 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0017-C3AS) in Appendix O is 102 ug/kg and the result for the duplicate (08A-0017-C3AT) is 20.4 ug/kg. The average of these results is 61.2 ug/kg (or 0.0612 mg/kg).
		2. Location 066; the result for sample 08A-017-C1AS is 0.0128 mg/kg in Appendix O. The CPG's figure has a value of 0.0115 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 12.8 ug/kg and the result for the duplicate (08A-0066-C1AT) is 10.1 ug/kg. The average of these results is 11.45 ug/kg (or 0.0115 mg/kg).
	Figure 3-3.g Dieldrin 0 – 0.5 feet	1. Location 017; the result for sample 08A-017-C1AS is 0.0049 mg/kg in Appendix O. The CPG's figure has a value of 0.0031 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0017-C3AS) in Appendix O is 4.9 J ug/kg and the result for the duplicate (08A-0017-C3AT) is 1.3 J ug/kg. The average of these results is 3.1 ug/kg (or 0.0031 mg/kg).
		2. Location 029; the result for sample 08A-029-C1AS is 0.0022 mg/kg in Appendix O. The CPG's figure has a value of 0.0024 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0029-C2AS) in Appendix O is 2.2 J ug/kg and the result for the duplicate (08A-0029-C2AT) is 2.5 J ug/kg. The average of these results is 2.35 ug/kg (or 0.0024 mg/kg).
		3. Location 066; the result for sample 08A-066-C1AS is 0.0013 mg/kg in Appendix O. The CPG's figure has a value of 0.0011 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 1.3 ug/kg and the result for the duplicate (08A-0066-C1AT) is 0.99 ug/kg. The average of these results is 1.145 ug/kg (or 0.0011 mg/kg).

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7	Figure 3-3.h Total Chlordane (CPG Calc) 0 – 0.5 feet	1. Location 017; the result for sample 08A-017-C1AS is 0.0952 mg/kg in Appendix O. The CPG's figure has a value of 0.0565 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0017-C3AS) in Appendix O is 0.0952 mg/kg and the result for the duplicate (08A-0017-C3AT) is 0.0178 mg/kg. The average of these results is 0.0565 mg/kg.
	Figure 3-3.h Total Chlordane (CPG Calc) 0 – 0.5 feet (continued)	2. Location 029; the result for sample 08A-029-C1AS is 0.287 mg/kg in Appendix O. The CPG's figure has a value of 0.03232 mg/kg.	The value on the figure is 0.0323 mg/kg. The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0029-C2AS) in Appendix O is 0.0287 mg/kg and the result for the duplicate (08A-0029-C2AT) is 0.0358 mg/kg. The average of these results is 0.03225 mg/kg (rounded to 0.0323 mg/kg).
		3. Location 066; the result for sample 08A-066-C1AS is 0.0187 mg/kg in Appendix O. The CPG's figure has a value of 0.0153 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 0.0187 mg/kg and the result for the duplicate (08A-0066-C1AT) is 0.0119 mg/kg. The average of these results is 0.0153 mg/kg.
		4. Location 103; the result for sample 08A-103-C1AS is 0.0103 mg/kg in Appendix O. The CPG's figure has a value of 0.01077 mg/kg.	Note that this comment is incorrect. The correct value is presented in the figure. The value in the figure is 0.0103 mg/kg. The result for the surface sample (08A-0103-C1AS) in Appendix O is 0.0103 mg/kg.
	Figure 3-3.i Mercury 0 – 0.5 feet	1. Location 017; the result for sample 08A-017-C1AS is 2.53 mg/kg in Appendix O. The CPG's figure has a value of 2.69 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0017-C2AS) in Appendix O is 2,530 J ng/g and the result for the duplicate (08A-0017-C2AT) is 2,850 J ng/g. The average of these results is 2,690 ng/g (or 2.69 mg/kg).
		2. Location 035; the result for sample 08A-035-C1AS is 0.0385 mg/kg in Appendix O. The CPG's figure has a value of 0.0556 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0035-C5AS) in Appendix O is 38.5 J ng/g and the result for the duplicate (08A-0035-C5AT) is 72.7 J ng/g. The average of these results is 55.6 ng/g (or 0.0556 mg/kg).
		3. Location 066; the result for sample 08A-066-C1AS is 0.112 mg/kg in Appendix O. The CPG's figure has a value of 0.124 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0066-C1AS) in Appendix O is 112 ng/g and the result for the duplicate (08A-0066-C1AT) is 136 ng/g. The average of these results is 124 ng/g (or 0.124 mg/kg).

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7		4. Location 087; the result for sample 08A-087-C1AS is 0.438 mg/kg in Appendix O. The CPG's figure has a value of 0.28 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0087-C3AS) in Appendix O is 438 J ng/g and the result for the duplicate (08A-0087-C3AT) is 122 J ng/g. The average of these results is 280 ng/g (or 0.28 mg/kg).
	Figure 3-3.I Lead 0 – 0.5 feet	1. Location 029; the result for sample 08A-029-C1AS is 228 mg/kg in Appendix O. The CPG's figure has a value of 224 mg/kg.	The correct value is presented in the figure which is the average of the sample and the duplicate result. The result for the surface sample (08A-0029-C3AS) in Appendix O is 228 J mg/kg and the result for the duplicate (08A-0029-C3AT) is 219 J mg/kg. The average of these results is 223.5 mg/kg (rounded to 224 mg/kg).

Other Changes:

The title of the document was corrected from “Lower Resolution Coring Characterization Summary” to “Low Resolution Coring Characterization Summary” on the cover pages.